

COOLEY LLP  
MICHELLE C. DOOLIN (179445) (doolinmc@cooley.com)  
4401 Eastgate Mall  
San Diego, CA 92121  
Telephone: (858) 550-6000  
Facsimile: (858) 550-6420

COOLEY LLP  
BEATRIZ MEJIA (190948) (mejiab@cooley.com)  
MATTHEW M. BROWN (264817) (brownmm@cooley.com)  
101 California Street, 5th Floor  
San Francisco, CA 94111-5800  
Telephone: (415) 693-2000  
Facsimile: (415) 693-2222

Attorneys for Defendant  
COLE HAAN COMPANY STORE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

TAMMIE DAVIS, an individual, and  
VALERIA LLETGET, an individual, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

COLE HAAN COMPANY STORE, a Maine  
Corporation; and DOES 1 through 50,  
inclusive,

Defendants.

STEFANI CONCEPCION, an individual, on  
behalf of herself and all others similarly  
situated,

Plaintiff,

v.

COLE HAAN COMPANY STORE, a Maine  
Corporation; and DOES 1 through 50,  
inclusive,

Defendants.

Consolidated Case No. 11-cv-01826-JSW

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO VACATE THE CASE MANAGEMENT  
CONFERENCE SET FOR MARCH 22, 2013**

Hon. Jeffrey S. White  
Courtroom 11, 19<sup>th</sup> Floor

Pursuant to L.R. 6-2, Plaintiffs Tammie Davis, Valeria Lletget, and Stefani Concepcion (“Plaintiffs”) and defendant Cole Haan Company Store (“Cole Haan”), by and through their respective counsel (collectively, the “Parties”) stipulate as follows:

# **RECITALS**

**WHEREAS**, the Court has scheduled a Case Management Conference for March 22, 2013 at 1:30 p.m., in Courtroom 11 on the 19th floor of the Federal Building, 450 Golden Gate Avenue, San Francisco, California, and has ordered a joint case management statement due on or before March 15, 2013 [Docket No. 67];

**WHEREAS**, the Parties have agreed in principle to settle the instant action, and are close to executing a settlement agreement; and

**WHEREAS**, Plaintiffs will file a motion for preliminary approval of the Parties’ settlement agreement on or before March 29, 2013;

# **STIPULATION**

Now, therefore, the Parties stipulate and respectfully request that the Court order as follows:

1. That the Case Management Conference scheduled for March 22, 2013 will be vacated and that the Parties are not required to file a joint case management statement, due to the Parties’ imminent settlement agreement.

**IT IS SO STIPULATED.**

Dated: March 7, 2013

COOLEY LLP  
MICHELLE C. DOOLIN  
BEATRIZ MEJIA  
MATTHEW M. BROWN

/s/ Michelle C. Doolin  
Michelle C. Doolin

Attorneys for Defendant  
COLE HAAN COMPANY STORE

1 Dated: March 4, 2013

PATTERSON LAW GROUP, APC  
JAMES R. PATTERSON (211102)

2  
3 /s/ James R. Patterson  
James R. Patterson

4 Attorneys for Plaintiff  
5 TAMMIE DAVIS and VALERIA LLETGET

6 Dated: March 4, 2013

7 STONEBARGER LAW, APC  
GENE J. STONEBARGER (209461)  
RICHARD D. LAMBERT (251148)

8  
9 /s/ Gene J. Stonebarger  
Gene J. Stonebarger

10 Attorneys for Plaintiff  
11 STEFANI CONCEPCION

12  
13 **FILER'S ATTESTATION**

14 Pursuant to Civil Local Rule 5-1(i)(3), the undersigned attests that all parties have  
15 concurred in the filing of this Stipulation And [Proposed] Order To Vacate The Case  
16 Management Conference Set For March 22, 2013.

17  
18 Dated: March 7, 2013

19 COOLEY LLP  
MICHELLE C. DOOLIN  
BEATRIZ MEJIA  
MATTHEW M. BROWN

20  
21 /s/ Michelle C. Doolin  
Michelle C. Doolin

22 Attorneys for Defendant  
23 COLE HAAN COMPANY STORE  
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1 **IT IS SO ORDERED.**

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3 Dated: March 12, 2013

  
The Honorable Jeffrey S. White  
United States District Judge

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